

Francisco J. Vizcarrondo Torres, Esq.

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Invoice submitted to:

María del Carmen Warren González
 PO Box 9767
 Carolina, PR 00988

May 12, 2015

In Reference To: María del Carmen Warren, et al. vs. Commonwealth of P.R., et al.
 Administrative case no.: 2013-100-083
 O/F: 177-001

Invoice # 13567

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
11/11/2013 FJV Telephone conference with Mrs. María del Carmen Warren re: informing us of urgent need to engage counsel for special education action against the DOE and preliminary discussion of case.	0.30 135.00/hr	40.50
11/12/2013 FJV Draft notice of appearance and request for extension of time to file amended administrative complaint.	0.40 135.00/hr	54.00
FJV Attend initial client-attorney meeting re: discussed Z.C.W.'s current educational and related services situation, claims against the DOE, available courses of action, and formalized engagement of counsel, among other case related matters discussed.	2.20 135.00/hr	297.00
11/18/2013 FJV Draft urgent motion requesting order.	1.00 135.00/hr	135.00
FJV Review Order issued by ALJ Luis Tommassini on November 18, 2013.	0.10 135.00/hr	13.50
11/21/2013 FJV Review DOE's reply to urgent motion requesting order.	0.20 135.00/hr	27.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/22/2013	FJV	0.10 135.00/hr	13.50
	Review Order issued by ALJ Manuel Tomassini on November 21, 2013.		
	FJV	0.10 135.00/hr	13.50
	Draft e-mail communication to DOE's counsel, attorney Pedro Solivan and Brenda Virella, re: informing date and times available for scheduling meeting to review and obtain copy of our client's academic file.		
	FJV	0.10 135.00/hr	13.50
	Review e-mail communication sent by DOE's counsel. attorney Brenda Virella, re: informing availability to coordinate meeting for inspection of the student's original academic file.		
	FJV	0.10 135.00/hr	13.50
	Draft e-mail communication to DOE's counsel, attorney Brenda Virella and Pedro Solivan, re: discussing various case related matters in anticipation to attorney's meeting.		
11/25/2013	FJV	2.00 135.00/hr	270.00
	Commenced drafting amended administrative complaint.		
	FJV	1.00 135.00/hr	135.00
	Review and study documentary evidence submitted by clients re: preparation for drafting amended administrative complaint.		
	FJV	0.30 135.00/hr	40.50
	Telephone conference with Mrs. María del Carmen Warren re: clarifying several doubts concerning factual background, and contents of amended administrative complaint.		
11/26/2013	FJV	0.30 135.00/hr	40.50
	Plan and prepare for meeting with DOE's counsel.		
	FJV	0.70 135.00/hr	94.50
	Attend meeting with DOE's counsel, attorney Brenda Virella, re: reviewing original copy of Z.C.W.'s academic file.		
11/27/2013	FJV	1.00 135.00/hr	135.00
	Final drafting, editing and reviewing of amended administrative complaint.		
	FJV	0.10 135.00/hr	13.50
	Review Order issued by ALJ Luis Tomassini on November 27, 2013.		

		<u>Hrs/Rate</u>	<u>Amount</u>
11/27/2013 FJV	Telephone conference with Mrs. María del Carmen Warren re: client update on current status of case proceedings.	0.10 135.00/hr	13.50
12/12/2013 FJV	Attend meeting with Mrs. María del Carmen Warren re: discussing clients' objections to complete contents of student's educational file, and discussing multiple other case related matters.	1.50 135.00/hr	202.50
FJV	Review and study documentary evidence available in file re: preparation for drafting motion to notify evidence.	0.60 135.00/hr	81.00
FJV	Draft motion to notify documentary and testimonial evidence to be used in administrative hearing.	1.30 135.00/hr	175.50
FJV	Draft various e-mail communications to DOE's counsel, attorney Brenda Virella and Pedro Solivan, re: enclosing production of plaintiff's documentary evidence.	0.10 135.00/hr	13.50
12/13/2013 FJV	Review DOE's answer to the amended administrative complaint.	0.20 135.00/hr	27.00
FJV	Review DOE's motion to notify documentary and testimonial evidence.	0.10 135.00/hr	13.50
FJV	Review and study the documentary evidence produced by the DOE.	0.40 135.00/hr	54.00
12/16/2013 FJV	Review Order issued by ALJ Luis Tomassini on December 15, 2013 re: noting DOE's answer to the amended administrative complaint.	0.10 135.00/hr	13.50
FJV	Review Order issued by ALJ Luis Tomassini on December 15, 2013 re: noting DOE's motion to notify documentary and testimonial evidence.	0.10 135.00/hr	13.50
FJV	Review DOE's opposition to motion to notify plaintiff's testimonial evidence.	0.10 135.00/hr	13.50

		<u>Hrs/Rate</u>	<u>Amount</u>
12/16/2013 FJV	Review Urgent Order issued by ALJ Luis Tomassini on December 16, 2013.	0.10 135.00/hr	13.50
12/17/2013 FJV	Review Order issued by ALJ Luis Tomassini on December 16, 2013 re: noting plaintiff's motion to notify documentary and testimonial evidence.	0.10 135.00/hr	13.50
FJV	Legal research of federal and state case law, statutes, regulations and secondary materials re: grounds to support reply memorandum to DOE's opposition to motion for default entry.	2.50 135.00/hr	337.50
FJV	Draft reply memorandum to DOE's opposition.	5.50 135.00/hr	742.50
12/18/2013 FJV	Plan and prepare for meeting with Mrs. María del Carmen Warren.	0.40 135.00/hr	54.00
FJV	Attend meeting with María del Carmen Warren re: preparation of client for hearing and discussing multiple other case related matters in anticipation to hearing.	1.50 135.00/hr	202.50
FJV	Plan and prepare for tomorrow's administrative hearing.	2.50 135.00/hr	337.50
FJV	Legal research of federal and state case law, statutes, regulations and secondary sources re: preparation for legal arguments and controversies anticipated for tomorrow's administrative hearing.	1.20 135.00/hr	162.00
12/19/2013 FJV	Travel time re: time spent by counsel traveling to and from the DOE's Special Education District Offices in the Municipality of Carolina.	0.80 67.50/hr	54.00
FJV	Attend administrative hearing held in the DOE's Special Education District Offices in the Municipality of Carolina.	2.20 135.00/hr	297.00
12/23/2013 FJV	Review DOE's motion for extension of time to submit the proposed 2013-2014 I.E.P.	0.10 135.00/hr	13.50

		<u>Hrs/Rate</u>	<u>Amount</u>
1/9/2014	FJV	0.90 135.00/hr	121.50
	Plan and prepare for tomorrow's administrative forum mandated I.E.P. team meeting.		
	FJV	0.20 135.00/hr	27.00
	Telephone conference with Mrs. María del Carmen Warren re: discussing various case related matters in anticipation to tomorrow's administrative form mandated I.E.P. team meeting.		
1/10/2014	FJV	7.00 135.00/hr	945.00
	Attend I.E.P. team meeting held in the DOE's Arrayanes School in the Municipality of Carolina, as per the order issued by the hearing officer.		
	FJV	0.90 67.50/hr	60.75
	Travel time re: time spent by counsel traveling to and from the DOE's Arrayanes School in the rural areas of the Municipality of Carolina.		
1/28/2014	FJV	0.10 135.00/hr	13.50
	Review Order issued by ALJ Luis Tomassini on January 28, 2014.		
1/30/2014	FJV	0.10 135.00/hr	13.50
	Review e-mail communication sent by DOE's counsel, attorney Brenda Virella, re: enclosing proposed draft of Minutes for January 10, 2014 I.E.P. team meeting.		
	FJV	0.20 135.00/hr	27.00
	Review DOE's proposed draft of minutes of January 10, 2014 I.E.P. team meeting.		
	FJV	0.20 135.00/hr	27.00
	Telephone conference with Mrs. María del Carmen Warren re: discussing various case related matters in anticipation to tomorrow's follow up I.E.P. team meeting.		
	FJV	0.50 135.00/hr	67.50
	Plan and prepare for tomorrow's follow up I.E.P. team meeting.		
1/31/2014	FJV	3.20 135.00/hr	432.00
	Attend second session of ALJ-ordered I.E.P. team meeting held in the DOE's Arrayanes School in the Municipality of Carolina.		
	FJV	1.00 67.50/hr	67.50
	Travel time re: time spent by counsel traveling to and from the DOE's Arrayanes School in the Municipality of Carolina.		

		<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2014	FJV	1.00 135.00/hr	135.00
	Legal research of federal statutes, regulations and case law re: legal grounds to support relief requested in urgent motion requesting order pursuant to IDEA's stay put provision.		
	FJV	1.00 135.00/hr	135.00
	Draft urgent motion requesting "stay put" order.		
	MDF	1.50 50.00/hr	75.00
	Commenced drafting office memorandum re: applicability of IDEA's stay put provision.		
2/7/2014	FJV	0.20 135.00/hr	27.00
	Draft e-mail communication to Mrs. María del Carmen Warren re: discussing steps needed to be taken to achieve DOE's compliance with order.		
	FJV	0.20 135.00/hr	27.00
	Draft e-mail communication to DOE's counsel, attorney Brenda Virella and Pedro Solivan, re: discussing student Z.C.W.'s proposed 2013-2014 I.E.P.'s.		
	FJV	0.50 135.00/hr	67.50
	Review and study proposed 2013-2014 I.E.P.'s submitted to clients by DOE's personnel.		
	FJV	0.10 135.00/hr	13.50
	Review Order issued by ALJ Luis Tomassini in February 6, 2014.		
	FJV	0.20 135.00/hr	27.00
	Telephone conference with Mrs. María del Carmen Warren re: informing client of contents of ALJ's order and its implications in Z.C.W.'s related services.		
2/10/2014	MDF	1.70 50.00/hr	85.00
	Commenced drafting office memorandum re: factual and procedural topics to be discussed in opposition to motion for reconsideration.		
2/11/2014	FJV	0.50 135.00/hr	67.50
	Plan and prepare for tomorrow's ALJ ordered I.E.P. team meeting.		
	FJV	0.20 135.00/hr	27.00
	Telephone conference with Mrs. María del Carmen Warren re; discussing various case related matters in anticipation to tomorrow's I.E.P. team		

		<u>Hrs/Rate</u>	<u>Amount</u>
	meeting.		
2/11/2014 FJV	Legal research of federal statutes, case law and other sources re: grounds to support legal argument in opposition to DOE's motion for reconsideration.	1.50 135.00/hr	202.50
FJV	Draft opposition to DOE's motion for reconsideration.	1.20 135.00/hr	162.00
2/12/2014 FJV	Travel time re: time spent by counsel traveling to and from the DOE's Arrayanes School located in the rural areas of the Municipality of Carolina.	0.90 67.50/hr	60.75
FJV	Attend third session of ALJ-ordered I.E.P. team meeting held in the DOE's Arrayanes School in the Municipality of Carolina.	3.20 135.00/hr	432.00
MDF	Organize documents requested by attorney Francisco Vizcarrondo in anticipation to third session of ALJ-ordered IEP team meeting.	1.30 50.00/hr	65.00
2/13/2014 FJV	Review Order issued by ALJ Luis Tomassini on February 13, 2014.	0.10 135.00/hr	13.50
2/14/2014 FJV	Review Order issued by ALJ Luis Tomassini on February 14, 2014 re: denying DOE's motion for reconsideration.	0.10 135.00/hr	13.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: updating client on recent case events and of contents of orders recently issued by the ALJ.	0.20 135.00/hr	27.00
2/19/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing current status of case proceedings and Z.C.W.'s situation at school.	0.20 135.00/hr	27.00
2/24/2014 FJV	Review DOE's informative motion.	0.10 135.00/hr	13.50

		<u>Hrs/Rate</u>	<u>Amount</u>
2/24/2014	FJV	0.10 135.00/hr	13.50
	Review Order issued by ALJ Luis Tomassini on February 21, 2014.		
	FJV	0.10 135.00/hr	13.50
	Draft e-mail communication to Mrs. María del Carmen Warren re: updating client on recent case events.		
2/25/2014	FJV	0.80 135.00/hr	108.00
	Attend meeting with Mrs. María del Carmen Warren re: discussing recent case development and upcoming proceedings, among other case related matters.		
	FJV	0.30 135.00/hr	40.50
	Review and study progress reports and intervention plans submitted by Z.C.W.'s speech and language pathologist, Mrs. Betsy Soto.		
	FJV	0.10 135.00/hr	13.50
	Draft e-mail communication to DOE's counsel, attorneys Brenda Virella and Pedro Solivan, re: enclosing as requested production of Z.C.W.'s speech and language therapy progress report and intervention plan.		
3/4/2014	FJV	0.10 135.00/hr	13.50
	Telephone conference with DOE's counsel, attorney Pedro Solivan, re: informing need for us to contact client to resolve issue with Z.C.W.'s speech and language process reports.		
	FJV	0.30 135.00/hr	40.50
	Telephone conference with Mrs. María del Carmen Warren re: discussing client's issues with recent measures taken by the DOE, as well as multiple other case related matters.		
	FJV	0.20 135.00/hr	27.00
	Draft e-mail communication to counsel for the DOE, attorneys Pedro Solivan and Brenda Virella, re: informing results of telephone conference with client and suggesting potential solution to pending controversies.		
3/6/2014	FJV	0.60 135.00/hr	81.00
	Plan and prepare for tomorrow's follow up I.E.P. team meeting.		
	FJV	1.00 135.00/hr	135.00
	Attend meeting with Mrs. María del Carrmen Warren re: discussing multiple case related matters in anticipation to tomorrow's follow up I.E.P. team meeting.		

		<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2014 FJV	Review e-mail communication sent by DOE's counsel, attorney Brenda Virella and Pedro Solivan, re: reiterating DOE's request for the appearance of all of Z.C.W.'s therapists to tomorrow's I.E.P. team meeting.	0.10 135.00/hr	13.50
FJV	Review supplementary documents submitted by client re: Z.C.W.'s nutritional plan and evidence of submittal to the DOE.	0.20 135.00/hr	27.00
FJV	Draft e-mail communication to DOE's counsel, attorneys Virella and Solivan, re: enclosing digitalized copy of Z.C.W.'s nutritional plan and confirming appearance of the student's therapists to I.E.P. team meeting.	0.10 135.00/hr	13.50
3/7/2014 FJV	Travel time re: time spent by counsel traveling to and from the DOE's Arrayanes School in the rural areas of the Municipality of Carolina for attendance to ALJ ordered follow up I.E.P. team meeting.	1.10 67.50/hr	74.25
FJV	Attend fourth session of ALJ ordered I.E.P. team meeting held in the DOE's Arrayanes School.	6.00 135.00/hr	810.00
3/10/2014 FJV	Review e-mail communication sent by DOE's counsel, attorney Brenda Virella, re: enclosing adapted physical education assessment/evaluation procedures.	0.10 135.00/hr	13.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: informing client of the adapted physical education assessment procedures submitted by DOE's counsel.	0.10 135.00/hr	13.50
FJV	Review and study the twelve (12) page long adapted physical education assessment procedures manual produced by the DOE.	0.30 135.00/hr	40.50
3/11/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: clarifying client's multiple inquiries concerning today's assessment in adapted physical education, and discussing other case related matters.	0.30 135.00/hr	40.50
FJV	Review additional documentary evidence submitted by Mrs. Warren.	0.20 135.00/hr	27.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/14/2014 FJV	Telephone conference with Mrs. Carmen Warren re: informing us of this week's events with DOE's personnel concerning Z.C.W.'s educational and related services.	0.10 135.00/hr	13.50
FJV	Review e-mail communication sent by DOE's counsel, attorney Brenda Virella, re: discussing DOE's need to reschedule upcoming I.E.P. team meeting.	0.10 135.00/hr	13.50
3/17/2014 FJV	Sent and received various e-mail communications to and from DOE's counsel, attorney Brenda Virella, re: discussing status of adapted physical education assessment report, and other case related matters.	0.20 135.00/hr	27.00
FJV	Draft e-mail communications to Mrs. María del Carmen Warren re: client update on results of conversations with opposing counsel and other case related matters.	0.20 135.00/hr	27.00
3/18/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: informing us of rescheduling of asistive technology reevaluation due to student's illness.	0.10 135.00/hr	13.50
FJV	Draft e-mail communication to DOE's counsel, attorneys Virella and Solivan, re: informing of scheduling of assistive technology assessment due to student illness.	0.10 135.00/hr	13.50
3/19/2014 FJV	Review e-mail communication sent by DOE's counsel, attorney Brenda Virella re: rescheduling of assessment in assistive technology.	0.10 135.00/hr	13.50
FJV	Review e-mail communication sent by DOE's counsel, attorney Brenda Virella re: enclosing digitalized copy of Z.C.W.'s adapted physical education assessment report.	0.10 135.00/hr	13.50
FJV	Review and study Z.C.W.'s adapted physical education assessment report.	0.20 135.00/hr	27.00
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: enclosing for client's review and file a digitalized copy of Z.C.W.'s	0.10 135.00/hr	13.50

		<u>Hrs/Rate</u>	<u>Amount</u>
	adapted physical education assessment report.		
3/25/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: updating us on her daughter's current health situation and discussing upcoming assistive technology assessment.	0.10 135.00/hr	13.50
3/31/2014 FJV	Draft e-mail communication to DOE's counsel, attorneys Brenda Virella and Pedro Solivan, re: informing opposing counsel of need to reschedule upcoming case proceedings due to the student's serious health issues.	0.10 135.00/hr	13.50
4/7/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: updating us on her daughter's current health situation.	0.10 135.00/hr	13.50
4/23/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: client update on current educational situation of student Zuanía Cabrera and discussing other case related matters.	0.20 135.00/hr	27.00
FJV	Sent and received various e-mail communications to and from DOE's counsel, attorneys Brenda Virella and Pedro Solivan, re: informing of need to reschedule tomorrow's I.E.P. team meeting due to medical leave of absence of Z.C.W.'s special education teacher, and discussing current status of other case related matters.	0.20 135.00/hr	27.00
5/2/2014 FJV	Review DOE's motion informing current status of case proceedings.	0.10 135.00/hr	13.50
5/5/2014 FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: client update on current status of case proceedings.	0.10 135.00/hr	13.50
6/3/2014 FJV	Review letter communication sent by DOE's counsel re: settlement offer.	0.10 135.00/hr	13.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: discussing contents of DOE's settlement offer letter.	0.20 135.00/hr	27.00
6/4/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing contents of DOE's settlement offer letter and clients' decision to reject such terms contents of settlement counteroffer, and current status of	0.40 135.00/hr	54.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	DOE's compliance with Z.C.W.'s educational and related services needs.		
6/11/2014 FJV	Review letter communication sent on June 11, 2014 by DOE's counsel, attorneys Brenda Virella and Pedro Solivan.	0.10 135.00/hr	13.50
7/15/2014 FJV	Draft motion to notify vacation period.	0.10 135.00/hr	13.50
7/18/2014 FJV	Review notification of vacation period sent by ALJ Luis Tomassini on July 18, 2014.	0.10 135.00/hr	13.50
8/5/2014 FJV	Review letter communication sent by DOE's counsel on August 5, 2014 re: reiterating DOE's settlement offer.	0.10 135.00/hr	13.50
FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing terms of DOE's letter reiterating previous settlement offer.	0.10 135.00/hr	13.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: informing client of DOE's new settlement offer letter.	0.10 135.00/hr	13.50
8/6/2014 FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: requesting information from client needed for drafting settlement counteroffer letter to the DOE.	0.20 135.00/hr	27.00
FJV	Telephone conference with Mrs. María del Carmen Warren re: informing us of DOE's continued non-compliance with I.E.P. team meeting agreements, and discussing other case related matters.	0.20 135.00/hr	27.00
FJV	Commenced drafting letter communication to DOE's counsel re: terms and conditions of plaintiff's settlement counteroffer.	1.50 135.00/hr	202.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: enclosing draft of the settlement counteroffer letter for clients' review and approval.	0.10 135.00/hr	13.50

		<u>Hrs/Rate</u>	<u>Amount</u>
8/11/2014 FJV	Final drafting, editing and reviewing re: settlement counteroffer letter.	2.90 135.00/hr	391.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: discussing with client final version of settlement counteroffer letter.	0.10 135.00/hr	13.50
9/4/2014 FJV	Draft motion to notify counsel vacation period.	0.10 135.00/hr	13.50
10/7/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing current status of case proceedings.	0.10 135.00/hr	13.50
FJV	Draft letter communication to DOE's counsel, attorneys Brenda Virella and Pedro Soliván, re: reiterating settlement demand terms and conditions.	0.60 135.00/hr	81.00
10/22/2014 FJV	Attend meeting with Mrs. María del Carmen Warren re: discussed current status of case proceedings, need to request reactivation of administrative case, and related services that are still not being provided to her daughter.	1.50 135.00/hr	202.50
10/31/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing up to date DOE's failure to respond to plaintiff's settlement demand and discussing upcoming case proceedings.	0.20 135.00/hr	27.00
11/4/2014 FJV	Sent and received e-mail communication to and from DOE's counsel, attorney Flory Mar De Jesús, re: discussing plaintiff's settlement demand.	0.10 135.00/hr	13.50
FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing today's events with regards to DOE's reaction to our settlement demand letter.	0.10 135.00/hr	13.50
12/11/2014 FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing up to date DOE's failure to respond to our settlement counteroffer and other case related matters.	0.20 135.00/hr	27.00

		<u>Hrs/Rate</u>	<u>Amount</u>
12/16/2014 FJV	Sent and received multiple e-mail communications to and from DOE's counsel, attorney Flory Mar De Jesús, re: settlement negotiations.	0.20 135.00/hr	27.00
FJV	Review letter communication sent by DOE's counsel, attorney Flory Mar De Jesús, on December 16, 2014.	0.10 135.00/hr	13.50
FJV	Draft various e-mail communications to Mrs. María del Carmen Warren, re: discussing settlement related matters.	0.10 135.00/hr	13.50
FJV	Various telephone conferences with Mrs. María del Carmen Warren re: further settlement related discussions with client.	0.30 135.00/hr	40.50
12/17/2014 FJV	Sent and received e-mail communications to and from DOE's counsel, attorney Flory Mar De Jesús, re: further settlement discussions.	0.20 135.00/hr	27.00
12/29/2014 FJV	Commenced drafting proposed consent decree.	1.60 135.00/hr	216.00
FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing terms of the proposed settlement stipulation.	0.20 135.00/hr	27.00
12/30/2014 FJV	Further drafting of proposed consent decree.	2.00 135.00/hr	270.00
FJV	Various telephone conferences with Mrs. María del Carmen Warren re: discussing contents of proposed settlement stipulation.	0.30 135.00/hr	40.50
FJV	Draft e-mail communication to DOE's counsel, attorney Flory Mar De Jesús, re: proposed consent decree.	0.10 135.00/hr	13.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: proposed consent decree.	0.10 135.00/hr	13.50
1/20/2015 FJV	Telephone conference with Mrs. María del Carmen Warren re: informing client's of DOE's up to date failure to respond to our proposed settlement	0.10 135.00/hr	13.50

		<u>Hrs/Rate</u>	<u>Amount</u>
	stipulation.		
1/27/2015 FJV	Telephone conference with Mrs. María del Carmen Warren re: client request for update on current status of settlement negotiations.	0.10 135.00/hr	13.50
2/11/2015 FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing clients' inquiries concerning current status of settlement negotiations and other case related matters.	0.20 135.00/hr	27.00
2/19/2015 FJV	Telephone conference with Mrs. María del Carmen Warren re: clarified client's inquiries concerning DOE's up to date failure to respond to the proposed consent decree, and discussing other case related matters.	0.20 135.00/hr	27.00
2/24/2015 FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing her daughter's current educational and related services situation and other case related matters.	0.10 135.00/hr	13.50
2/26/2015 FJV	Telephone conference with Mrs. María del Carmen Warren re: thorough discussion of her daughter's current educational and related services situation and of the DOE's up to date failure to respond to our settlement counteroffer.	0.30 135.00/hr	40.50
3/2/2015 FJV	Review and study the DOE's amended version of the joint consent decree.	1.00 135.00/hr	135.00
FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing impressions to changes and additions proposed by the DOE for the consent decree, and coordinating strategy and causes of action to undertake in case.	0.30 135.00/hr	40.50
FJV	Draft e-mail communication to DOE's counsel, attorney Flory Mar De Jesús, re: enclosing preliminary comments to amended draft of the consent decree submitted by the DOE.	0.10 135.00/hr	13.50
3/6/2015 FJV	Sent and received multiple e-mail communications to and from DOE's counsel, attorney Flory Mar De Jesús, re: follow up settlement	0.20 135.00/hr	27.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	negotiations.		
3/6/2015 FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: updating client on our efforts to advance settlement negotiations.	0.10 135.00/hr	13.50
3/10/2015 FJV	Telephone conference with Mrs. María del Carmen Warren re: further discussion of current status of counsel efforts to achieve the DOE's approval of the consent decree.	0.10 135.00/hr	13.50
3/16/2015 FJV	Review e-mail communication sent by DOE's counsel, attorney Flory Mar De Jesús, re: informing us of additional terms which the DOE intends to include to the consent decree.	0.10 135.00/hr	13.50
FJV	Further drafting, editing and reviewing of consent decree re: updating consent decree and amending its contents pursuant to parties agreements.	1.50 135.00/hr	202.50
FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing amendments to consent decree and seeking clients' approval.	0.20 135.00/hr	27.00
FJV	Draft e-mail communication to DOE's counsel, attorney Flory Mar De Jesús, re: enclosing updated version of the consent decree for DOE's review and approval, and discussing amendments made there to.	0.20 135.00/hr	27.00
3/27/2015 FJV	Draft e-mail communication to DOE's counsel, attorney Flory Mar De Jesús, re: follow up to DOE's approval of settlement stipulations.	0.10 135.00/hr	13.50
3/30/2015 FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: updating client on current status of settlement negotiations.	0.10 135.00/hr	13.50
4/7/2015 FJV	Draft e-mail communication to DOE's counsel, attorney Flory Mar De Jesús re: follow up to opposing counsel for information on DOE's position concerning the most recent draft of the settlement stipulation.	0.10 135.00/hr	13.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: informing client of DOE's up to date failure to notify its position concerning	0.10 135.00/hr	13.50

		<u>Hrs/Rate</u>	<u>Amount</u>
	the settlement stipulation.		
4/9/2015 FJV	Telephone conference with Mrs. María del Carmen Warren re: discussion DOE's up to date failure to respond to our multiple communications concerning the consent decree, among other case related matters.	0.20 135.00/hr	27.00
4/14/2015 FJV	Draft e-mail communication to DOE's counsel, attorney Flory Mar De Jesús, re: providing final deadline for DOE's response to the plaintiff's consent decree.	0.10 135.00/hr	13.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: updating client on current status of case proceedings.	0.10 135.00/hr	13.50
4/17/2015 FJV	Sent and received e-mail communications to and from DOE's counsel, attorney Flory Mar De Jesús, re: DOE's confirmation of approval of final version of consent decree and coordinating its joint filing.	0.20 135.00/hr	27.00
4/20/2015 FJV	Review e-mail communication sent by DOE's counsel, attorney Flory Mar De Jesús, re: enclosing response to our e-mail inquiry concerning joint signing of the consent decree.	0.10 135.00/hr	13.50
FJV	Final editing and preparation for filing re: consent decree.	0.40 135.00/hr	54.00
FJV	Draft e-mail communication to DOE's counsel, attorney Flory Mar De Jesús, re: enclosing settlement stipulation signed by plaintiff's counsel and requesting counsel availability for her signing of the document.	0.10 135.00/hr	13.50
FJV	Telephone conference with Mrs. María del Carmen Warren re: discussing signing of consent decree and other case related matters.	0.10 135.00/hr	13.50
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: informing client of final version of consent decree and enclosing copy of document.	0.10 135.00/hr	13.50
4/22/2015 FJV	Review e-mail communication sent by DOE's counsel, attorney Flory Mar De Jesús, re: updating us on current status her signing of the consent	0.10 135.00/hr	13.50

		<u>Hrs/Rate</u>	<u>Amount</u>
	decree.		
4/27/2015 FJV	Draft e-mail communication to DOE's counsel, attorney Flory Mar De Jesús, re: follow up to opposing counsel's signature of the consent decree.	0.10 135.00/hr	13.50
4/28/2015 FJV	Telephone conference with María del Carmen Warren re: discussing DOE's up to date failure to submit duly signed copy of the settlement stipulation.	0.10 135.00/hr	13.50
4/29/2015 FJV	Attend meeting with DOE's counsel, attorney Flory Mar De Jesús, re: signing of consent decree (including time spent by counsel waiting for opposing counsel).	1.00 135.00/hr	135.00
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: updating client on today's events in case.	0.10 135.00/hr	13.50
4/30/2015 FJV	Review Resolution issued by ALJ Tomassinni on April 29, 2015.	0.20 135.00/hr	27.00
FJV	Draft e-mail communication to Mrs. María del Carmen Warren re: informing client of ALJ's entry of final resolution and discussing its contents.	0.10 135.00/hr	13.50
5/5/2015 FJV	Telephone conference with Mrs. María del Carmen Warren re: coordinating client-attorney meeting to review and sign verified complaint for attorney's fees and costs.	0.10 135.00/hr	13.50
FJV	Commenced drafting verified complaint.	2.00 135.00/hr	270.00
5/7/2015 FJV	Further drafting, editing and reviewing of verified complaint.	1.00 135.00/hr	135.00
5/8/2015 FJV	Plan and prepare for meeting with Mrs. María del Carmen Warren.	0.20 135.00/hr	27.00

		<u>Hrs/Rate</u>	<u>Amount</u>
5/8/2015 FJV	Attend meeting with Mrs. María del Carmen Warren re: reviewed, discussed, and signed verified complaint.	1.00 135.00/hr	135.00
5/11/2015 FJV	Draft proposed summons for co-defendant, the Commonwealth of Puerto Rico.	0.20 135.00/hr	27.00
FJV	Draft proposed summons for co-defendant, the Department of Education.	0.20 135.00/hr	27.00
FJV	Draft civil cover sheet and category sheet forms to attach to verified complaint.	1.00 135.00/hr	135.00
5/12/2015 FJV	Final reviewing, editing and preparation for filing of verified complaint.	0.50 135.00/hr	67.50
FJV	Telephone conference with Mr. Héctor Soler, process server, re: coordinating service of process upon defendants.	0.10 135.00/hr	13.50
For professional services rendered		105.00	\$13,475.25

Additional Charges :

		<u>Qty/Price</u>	
11/12/2013 FJV	Copying cost re: notice of appearance and request for extension of time to file amended administrative complaint.	\$0.15 4	\$0.60
FJV	Copying cost re: documentary evidence submitted by clients.	\$0.15 147	\$22.05
11/18/2013 FJV	Copying cost re: urgent motion requesting order.	\$0.15 5	\$0.75
11/25/2013 FJV	Copying cost re: amended administrative complaint.	\$0.15 11	\$1.65
12/12/2013 FJV	Copying cost re: motion to notify documentary and testimonial evidence to be used in administrative hearing.	\$0.15 6	\$0.90

		<u>Qty/Price</u>	<u>Amount</u>
12/17/2013 FJV	Copying cost re: reply memorandum to DOE's opposition.	\$0.15 16	\$2.40
2/3/2014 FJV	Copying cost re: urgent motion requesting "stay put" order.	\$0.15 20	\$3.00
2/7/2014 FJV	Copying cost re: e-mail communication to DOE's counsel, attorney Brenda Virella and Pedro Solivan.	\$0.15 2	\$0.30
2/11/2014 FJV	Copying cost re: opposition to DOE's motion for reconsideration.	\$0.15 6	\$0.90
2/25/2014 FJV	Copying cost re: e-mail communication to DOE's counsel, attorney Brenda Virella and Pedro Solivan.	\$0.15 2	\$0.30
3/6/2014 FJV	Copying cost re: e-mail communication to DOE's counsel, attorney Brenda Virella and Pedro Solivan.	\$0.15 2	\$0.30
3/10/2014 FJV	Copying cost re: e-mail communication sent by DOE's counsel, attorney Brenda Virella..	\$0.15 1	\$0.15
3/31/2014 FJV	Copying cost re: e-mail communication sent by DOE's counsel, attorney Brenda Virella.	\$0.15 1	\$0.15
4/23/2014 FJV	Copying cost re: various e-mail communications to and from DOE's counsel, attorneys Brenda Virella and Pedro Solivan.	\$0.15 4	\$0.60
6/3/2014 FJV	Copying cost re: e-mail communication to Mrs. María del Carmen Warren.	\$0.15 1	\$0.15
7/15/2014 FJV	Copying cost re: motion to notify vacation period.	\$0.15 3	\$0.45
8/6/2014 FJV	Copying cost re: letter communication to DOE's counsel.	\$0.15 6	\$0.90

		<u>Qty/Price</u>	<u>Amount</u>
8/11/2014 FJV	Copying cost re: e-mail communication to DOE's counsel.	\$0.15 1	\$0.15
9/4/2014 FJV	Copying cost re: motion to notify counsel vacation period.	\$0.15 3	\$0.45
10/7/2014 FJV	Copying cost re: letter communication to DOE's counsel, attorneys Brenda Virella and Pedro Soliván.	\$0.15 8	\$1.20
11/14/2014 FJV	Copying cost re: documentary evidence.	\$0.15 4	\$0.60
12/29/2014 FJV	Copying cost re: proposed settlement stipulation.	\$0.15 1	\$0.15
12/30/2014 FJV	Copying cost re: e-mail communication to DOE's counsel, attorney Flory Mar De Jesús.	\$0.15 1	\$0.15
3/16/2015 FJV	Copying cost re: updated version of consent decree.	\$0.15 7	\$1.05
FJV	Copying cost re: e-mail communication to DOE's counsel, attorney Flory Mar De Jesús.	\$0.15 2	\$0.30
4/20/2015 FJV	Copying cost re: updated version of consent decree.	\$0.15 7	\$1.05
5/5/2015 FJV	Copying cost re: verified complaint.	\$0.15 12	\$1.80
5/8/2015 FJV	Copying cost re: final draft of verified complaint for client's signature of unsworn statement under penalty of perjury.	\$0.15 13	\$1.95
5/12/2015 FJV	Filing fee re: USDC-PR filing fee.	\$400.00 1	\$400.00

	<u>Qty/Price</u>	<u>Amount</u>
5/12/2015 FJV Service Fee re: cost of service of summons upon co-defendant, the Department of Education, by process server Héctor Soler.	\$50.00 1	\$50.00
FJV Service fee re: cost of service of summons upon co-defendant, the Commonwealth of Puerto Rico, by process server Héctor Soler.	\$50.00 1	\$50.00
FJV Copying cost re: copies of verified complaint for service of summons upon co-defendants.	\$0.15 114	\$17.10
Total additional charges		\$561.50
Total amount of this bill		\$14,036.75
Balance due		\$14,036.75

Reviewed and approved by:


Francisco J. Vizcarrondo Torres, Esq.
USDC-PR No. 221714